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September 20, 2011

**EX PARTE NOTICE**

VIA ECFS

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: Connect America Fund, WC Docket No. 10-90  
A National Broadband Plan for Our Future, GN Docket No. 09-51  
Establishing Just and Reasonable Rates for Local Exchange Carriers,  
WC Docket No. 07-135  
High-Cost Universal Service Support, WC Docket No. 05-337  
Developing a Unified Intercarrier Compensation Regime,  
CC Docket No. 01-92  
Federal-State Joint Board on Universal Service, CC Docket No. 96-45  
Lifeline and Link-Up, WC Docket No. 03-109**

Dear Ms. Dortch:

On September 19, 2011, Jerry James, CEO, COMPTTEL, Joe Gillan of Gillan Associates, and the undersigned met with Commissioner Copps and Margaret McCarthy of Commissioner Copps' Office to discuss the *Competitive Amendment* COMPTTEL submitted in the above-referenced dockets. Attached is the presentation, provided during the meeting, of the issues COMPTTEL discussed.<sup>1</sup>

In addition, COMPTTEL emphasized that the Commission's Order needs to confirm that IP interconnection is subject to 251(c)(2) of the Act so that carrier negotiations may begin. Any uncertainty in this area will further delay negotiations and have the effect of frustrating additional broadband deployment, in direct contravention of the Commission's goals. If the Commission were to adopt a further NPRM on this issue, it should only be to determine if rule changes are useful at this time, or if the statute provides sufficient guidance.

We also noted that even if the Commission were to bring all traffic under 251(b)(5), the state commissions, in accordance with the Act, should still have a significant role in setting the rates for reciprocal compensation.

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<sup>1</sup> In response to a question asked regarding the difference between the cap on the residential and business SLC, the residential SLC is \$6.50 and the business SLC is \$9.20, 47 CFR 69.152(d)(1)(ii)(D) and (k)(1)(i).

Respectfully submitted,

/s/ Karen Reidy

Karen Reidy  
VP –Regulatory Affairs

cc (via email): Margaret McCarthy